

PINO & ASSOCIATES
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Attorneys for Plaintiffs' Executive Committee appointed by the Superior Court of the State of California, in and for the County of Alameda, in Case No. RG16843631 and related cases.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN THE
PLAINTIFFS' EXECUTIVE COMMITTEE
APPOINTED BY THE SUPERIOR COURT
OF THE STATE OF CALIFORNIA, IN
AND FOR THE COUNTY OF ALAMEDA,
IN CASE NO. RG16843631 AND
RELATED CASES AND THE AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS EXTENDING TIME TO
RESPOND TO MOTION OF THE AD
HOC COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS TO
TERMINATE THE DEBTORS'
EXCLUSIVE PERIODS PURSUANT TO
SECTION 1121(d)(1) OF THE
BANKRUPTCY CODE**

Re: Dkt. No. 2741

[No Hearing Requested]

This stipulation and agreement for order (hereinafter referred to as the "Stipulation and Agreement for Order") is entered into by the Plaintiffs' Executive Committee appointed by the Superior Court of the State of California, in and for the County of Alameda, in Case No. RG16843631 and related cases (hereinafter referred to as the "Ghost Ship Warehouse Plaintiffs'

1 Executive Committee”), on the one hand, and the Ad Hoc Committee of Senior Unsecured
2 Noteholders (hereinafter referred to as the “Noteholders Committee”), on the other. The Ghost
3 Ship Warehouse Plaintiffs’ Executive Committee and the Noteholders Committee are referred to
4 in this Stipulation and Agreement for Order collectively as the “Parties,” and each as a “Party.”
5 The Parties hereby stipulate and agree as follows:
6

7 **RECITALS**

8 A. On July 11, 2019, the Noteholders Committee filed the *Motion of Ad Hoc*
9 *Committee of Senior Noteholders to Terminate the Debtors’ Exclusive Periods Pursuant to*
10 *Section 1121(d) of the Bankruptcy Code* [Dkt. No. 2741] (hereinafter referred to as the
11 “Noteholders Motion to Terminate Exclusivity”), which is set for a hearing before the Court at
12 9:30 a.m. on July 24, 2019. Any response or opposition to the Noteholders Motion to Terminate
13 Exclusivity is due by 4:00 p.m. (Pacific Time) on July 17, 2019.

14 B. Counsel for the Ghost Ship Warehouse Plaintiffs’ Executive Committee has
15 requested, and counsel for the Noteholders Committee has agreed, that the time for the Ghost
16 Ship Warehouse Plaintiffs’ Executive Committee to respond to the Noteholders Motion to
17 Terminate Exclusivity be extended.


18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
22 **THAT:**

23 1. The time for the Ghost Ship Warehouse Plaintiffs’ Executive Committee to
24 file and serve any response or opposition to the Noteholders Motion to Terminate Exclusivity is
25 extended through 4:00 p.m. (Pacific Time) on July 18, 2019.

26 [Signatures on next page]
27
28

1 Dated: July 16, 2019

2 PINO & ASSOCIATES

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4
5 By: 
6 Estela O. Pino,
7 Attorneys for Ghost Ship Warehouse
8 Plaintiffs' Executive Committee.

Dated: July 16, 2019

AKIN GUMP STRAUSS HAUER &
FELD LLP

By: /s/ Ashley Vinson Crawford
Ashley Vinson Crawford,
Attorneys for Ad Hoc Committee of
Senior Unsecured Noteholders.